

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

Row Vaughn Wells,

Plaintiff,

v.

The City of Memphis *et al.*,

Defendants.

Case No. 2:23-CV-02224

**PLAINTIFF'S MOTION FOR LEAVE TO FILE
RESPONSE BRIEF IN EXCESS OF 20 PAGES**

Plaintiff, through her undersigned counsel, pursuant to Local Rule 7.2(e) submits this motion for leave to file *instanter* her response to Defendants' five Motions to Dismiss in excess of 20 pages. In support of her motion, Plaintiff states as follows:

1. On March 17, 2025, Plaintiff filed her Motion for Leave and Extension of Time to File Omnibus Response to Defendants' Motions to Dismiss. ECF 341. The Court granted this motion on March 18, 2025. ECF 342. In ECF 341, Plaintiff inadvertently omitted her request to seek leave to file a brief in excess of 20 pages pursuant to Local Rule 7.2(e).

2. On January 3, 2025, Plaintiff filed her First Amended Complaint. ECF 277. The defendants in this case have filed separate and joint motions to dismiss (ECF 300, 303, 307, 308 and 314). As a result, Plaintiff must respond to numerous distinct legal and factual arguments arising from the 85 pages of the combined Defendants' Motions to Dismiss.

3. Due to the length, complexity, and large number of motions to dismiss that Plaintiff's omnibus brief will address, Plaintiff requires up to 40 pages for her consolidated brief.

4. Pursuant to Local Rule 7.2(e), Plaintiff must seek leave to file memoranda in excess of 20 pages in length.

5. Plaintiff conferred via e-mail with Defendants regarding the relief requested in this motion. Defendants Hemphill and DeWayne Smith responded that they have no objection. The remaining defendants have not responded as of this filing.

6. Plaintiff respectfully submits that, for the foregoing reasons, good cause supports her request to file her omnibus response brief in excess of 20 pages.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests that this Court enter an order granting Plaintiff leave to file *instanter* her omnibus response in opposition to Defendants' motions to dismiss (ECF 300, 303, 307, 308 and 314) in excess of 20 pages.

Dated: March 20, 2025

Respectfully submitted,

/s/ Stephen H. Weil

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CERTIFICATE OF CONSULTATION

Plaintiff conferred via e-mail with Defendants regarding the relief requested in the foregoing motion. Defendants Hemphill and DeWayne Smith responded that they have no objection. The remaining defendants have not responded as of this filing.

s/Stephen H. Weil